

PERKINScoie

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FEDERAL ELECTION  
COMMISSION  
700 13th Street, NW  
Suite 600  
Washington, D.C. 20005-3960  
2017 JUN 32 AM 6:20

+1.202.654.6200  
+1.202.654.6211  
PerkinsCoe.com

June 1, 2017

OFFICE OF GENERAL  
COUNSEL

VIA HAND DELIVERY

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Jeff S. Jordan, Esq.  
Assistant General Counsel  
Office of Complaints Examination & Legal Administration  
Attn: Kathryn Ross, Paralegal  
Federal Election Commission  
999 E Street N.W.  
Washington, D.C. 20463

Re: MUR 7157

Dear Mr. Jordan:

On behalf of Democratic National Committee and William Q. Derrough, in his official capacity as Treasurer ("Respondents"), we write in response to the "Supplemental Filing to Complaint" in MUR 7157 that the Federal Election Commission (the "Commission") provided by letter dated March 28, 2017 (the "Supplemental Filing"). Respondents answered the original Complaint in a response dated December 19, 2016, which is attached for your records. The additional information provided in the Supplemental Filing does not support any adverse finding against Respondents, and the Commission should still find no reason to believe Respondents violated the Federal Election Campaign Act of 1971, as amended, 52 U.S.C. § 30101 *et seq.* ("the Act").<sup>1</sup>

The Supplemental Filing simply repeats the Complaint's original arguments while providing no additional facts to support it. Neither the Complaint nor the Supplemental Filing points to any specific act by Respondents that indicates the receipt of any contribution. Specifically, regarding alleged "electoral signs," *see* Supplemental Filing at 9, the Supplemental Filing alleges no conduct by Respondents that pertained to the one sign at issue here. The Supplemental Filing incorrectly cites to MUR 6659 (Murray Energy Corporation) for support of the claim that an individual, hand-held sign constitutes a public communication under the Act. However, the facts here are easily distinguishable. First, the signs in MUR 6659 were yard signs, which the Commission has already found to be public communications under the Act.<sup>2</sup> Second, and more

<sup>1</sup> It is not clear whether Respondents received timely notice of the Supplemental Filing. Section 111.5(a) requires the Commission to "notify each respondent that the complaint has been filed, advise them of Commission compliance procedures, and enclose a copy of the complaint" within "five (5) days after receipt." However, even though the Commission's correspondence conveying the Supplemental Filing was dated March 28, 2017, Respondents did not receive it until April 17, 2017.

<sup>2</sup> *See, e.g.,* Conciliation Agreement, at 2, Matter Under Review 6659 (Murray Energy Corporation) (Sept. 15, 2015) ("Signs, including yard signs, are encompassed within the phrase, 'any other form of general public political

importantly, the Respondent in MUR 6659 purchased over 5,000 signs and decals, some of which were over eight feet long.<sup>3</sup> Here, the Supplemental Filing and original Complaint can only point to one, small hand-held sign. If the Commission were to extend the disposition in MUR 6659 to individual, hand-held signs, every volunteer-made sign would be required to include a paid-for-by disclaimer; there is nothing in the Commission's precedent that would support this illogical extension to the current facts.

Regarding the alleged "Donald Duck costumes" and "paid third-party protestors using cellular phones to emit duck call sounds," the Supplemental Filing not only fails to allege any conduct by Respondents pertaining to these activities, but also fails to demonstrate how any one of them would meet the definition of a "public communication" and thereby qualify as "coordinated communications" under the Act. For the reasons set forth in our original response, the Commission should dismiss the Complaint and close the file.

Very truly yours,



Marc E. Elias  
Graham Wilson  
Jacquelyn K. Lopez  
Counsel to Respondents

Enclosures

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advertising,' although they are not specifically enumerated in the definitions of public communication in 52 U.S.C. § 30101(22) and 11C.F.R. § 100.26.").

<sup>3</sup> First General Counsel's Report, at n.3, Matter Under Review 6659 (Murray Energy Corporation) (Aug. 5, 2013).

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700 13th Street, NW  
Suite 600  
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December 19, 2016

Marc E. Elias  
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Jeff S. Jordan  
Assistant General Counsel  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E. Street, N.W.  
Washington, D.C. 20463

Please date stamp this copy  
and give to messenger to  
return to Perkins Cole

RECEIVED  
FEC MAIL CENTER  
2016 DEC 19 PM 4:49

Re: MUR 7157

Dear Mr. Jordan:

On behalf of the Democratic National Committee ("Respondents"), we submit this letter in response to the complaint filed by Project Veritas Action Fund and James O'Keefe III ("Complainants") on October 20, 2016 (the "Complaint") alleging a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), or Federal Election Commission ("FEC" or "Commission") regulations. The Complaint fails to include any facts, which, if proven true, would constitute a violation of the Act.<sup>1</sup> The Commission should accordingly dismiss the Complaint and take no further action.

## Factual Background

Complainants claim that Respondents accepted impermissible in-kind contributions "in the form of coordinated expenditures" from a number of third-party organizations.<sup>2</sup> To support these allegations, the Complaint offers an unauthenticated "transcript" of conversations they surreptitiously recorded, involving agents of Americans United for Change ("AUFC") and Democracy Partners.<sup>3</sup> The Complaint provides the Commission with no authenticated, unedited recordings of these conversations that would permit the evaluation of the actual, complete statements in context.<sup>4</sup> Instead, the Complainants devised the questions themselves, cherry-picked excerpts of responses and presented them out of context, and then used these preferred excerpts to frame the instant Complaint.

Relying on this self-generated, spurious "documentation," Complainants then mount a sweeping coordination claim against Respondents. Complainants claim that Respondents were "materially

<sup>1</sup> See 11 C.F.R. § 111.4(d)(3).

<sup>2</sup> Compl. at 14.

<sup>3</sup> Compl. Ex. A.

<sup>4</sup> See 11 C.F.R. § 111.4(d)(4) (requiring a complaint to "be accompanied by any documentation supporting the facts alleged if such documentation is known of, or available to, the complainant.").

involved in decisions about content, means, and mode of communication,” and had “substantial discussion[s]” with third-party organizations, and “participated in weekly calls to determine shared electoral strategy” with third-party organizations.<sup>5</sup> According to the Complaint, those third-party organizations then “engaged in the production of public communications.”<sup>6</sup> The Complaint calls this “[o]utside group shared messaging.”<sup>7</sup>

Once the Complaint is shorn of its repeated, conclusory allegations, it presents only a handful of specific allegations regarding Respondents, despite its claim of a six-month “undercover” investigation:<sup>8</sup>

- It quotes Americans United for Change’s Scott Foval as saying: “So the operation is to insert and get the doc message in there if we can or the extremist message depending on - we have to clear this with the DNC.”<sup>9</sup> Scott Foval allegedly continued: “With the Democratic National Committee, we have to clear which methods we’re going to be targeting at each event but they can insert into multiple events now through the end of the election on a continual - on a daily basis but basically do a chase all the way across the country.”<sup>10</sup> The Complaint does not say with whom Foval spoke, whether that person actually worked for Respondents, or which activity Foval is even describing and whether the activity ever happened at all.
- It suggests that Respondents “participated in weekly calls to determine shared electoral strategy,” while detailing no actual call, and leaving open the question of whether Respondents even participated at all.<sup>11</sup>
- It alleges that Respondents coordinated with non-party, non-candidate groups, through the operation of a “Donald Ducks” mascot and related activity.<sup>12</sup>

#### Legal Analysis

The Complaint fails to provide reason to believe that any unlawful coordination occurred. As noted above, the Complaint hinges entirely on spurious videos and transcripts that the Complainants generated themselves and then provided only selectively to the Commission, in apparent contravention of 11 C.F.R. § 111.4(d)(4). Yet even if one were to assume the

<sup>5</sup> Compl. at 8.

<sup>6</sup> Compl. at 10.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 4.

<sup>9</sup> Compl. at 6.

<sup>10</sup> Compl. at 7.

<sup>11</sup> Compl. at 10.

<sup>12</sup> Compl. at 9; *see also* Compl. Ex. B.

documentation's authenticity and completeness, the Complaint would still fail to present a violation by Respondents. It fails to show any nexus between Respondents' conduct and any specific activity for which it did not pay.

Federal law treats a coordinated communication as an in-kind contribution to a campaign.<sup>13</sup> Each particular communication must satisfy a three-prong test to be considered a coordinated communication: it must (1) be paid for by a person other than a candidate, authorized committee or political party committee with which it is coordinated; (2) satisfy one or more content standards; and (3) satisfy one of several conduct standards.<sup>14</sup> Each prong must be satisfied for the communication to be considered coordinated, and thus an in-kind contribution.

Under Commission regulations, the content prong can be satisfied in one of five ways.<sup>15</sup> The first is to be an "electioneering communication," which must be publicly distributed by a television station, radio station, cable television station, or satellite system within 60 days before a general election or 30 days of a primary election.<sup>16</sup> The remaining four ways to satisfy the content prong require the communication be a "public communication,"<sup>17</sup> which the Act defines as "a communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public or any other form of general public political advertising."<sup>18</sup>

The Complaint does not identify any communication that would meet the content prong. It claims that Respondents "participated in weekly calls to determine shared electoral strategy" with outside groups, including "discussions about how to shape content and messaging to benefit" Respondents.<sup>19</sup> Labeling this "[o]utside group shared messaging," the Complaint assumes without knowledge or documentation that, "[b]ecause third-party groups engaged in the production of public communications," the content prong is satisfied.<sup>20</sup>

However, one cannot tell which "public communication" Complainants are referring to, as they fail to point to any specific activity involving Respondents that constitutes a public communication under the Act. Instead, Complainants cite to ambiguous references in the "transcript" of unspecified political activity by "numerous third-party groups."<sup>21</sup> The Complaint also alludes to plans to "have third-party groups launch protests at political events" without

<sup>13</sup> See 52 U.S.C. § 30101(8)(A); 11 C.F.R. § 109.20.

<sup>14</sup> 11 C.F.R. § 109.21.

<sup>15</sup> FEC Matter Under Review 6722 (House Majority PAC), General Counsel's Report at 4 (Aug. 6, 2013) (citing 11 C.F.R. § 109.21(c)(1)-(5)).

<sup>16</sup> See *id.* (citing 11 C.F.R. §§ 109.21(c)(1), 100.29(a), (b)(1)).

<sup>17</sup> *Id.* (citing 11 C.F.R. § 109.21(c)(2)-(5)).

<sup>18</sup> 52 U.S.C. § 30101(22); 11 C.F.R. §§ 100.26, 109.21(c).

<sup>19</sup> Compl. at 10.

<sup>20</sup> *Id.*

<sup>21</sup> Compl. at 7.

naming a specific group that is responsible.<sup>22</sup> Because the Complaint alleges no public communication in which Respondents actually participated, there can be no reason to believe that Respondents violated the Act.<sup>23</sup>

Similarly, the Complaint presents no facts to show that Respondents met the conduct prong as to any actual communication. It claims repeatedly that a wide range of communications “were directed, controlled or puppeteered by Respondents.”<sup>24</sup> But this is rank speculation, and the Commission has refused to entertain similarly sweeping conspiracy theories in the past.<sup>25</sup> For example, in MUR 5754, it was not enough for the complaint simply to say that a non-party, non-candidate group “made no secret of its ongoing communications with Democratic party officials.”<sup>26</sup> Rather, the complaint had to connect the supposed discussions to the alleged coordinated communications, which it did not do.<sup>27</sup> Similarly, this Complaint fails to provide any connection between Respondents and any actual “public communication,” and so for this reason also, the Commission should find no reason to believe a violation occurred.

The only specific activity that the Complaint alleges that was actually associated with Respondents—the “Donald Ducks” mascot—is one for which Respondents paid in full. Respondents had a contract with Mobilize, Inc., a vendor providing consulting services to Respondents during the 2016 cycle, and Respondents paid that vendor for the expenses associated with that mascot. *See* Exhibit A (detailing duck-related expenses). Neither the payment prong nor the content prong of the coordination rules was satisfied as to the duck. Respondents know of no expenses associated with any third party regarding the duck, and in any case they had fully paid for all expenses associated with the costuming, staffing and deployment of the duck. Yet even if any additional expenses had been incurred in relation to the duck’s

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<sup>22</sup> Compl. at 10.

<sup>23</sup> The Commission’s Office of General Counsel has consistently recommended dismissal of complaints alleging that communications other than “public communications” sponsored by third parties were illegal contributions. *See, e.g.*, FEC Matter Under Review 6477 (Right Turn USA), First General Counsel’s Report (Dec. 27, 2011); FEC Matter Under Review 6522 (Lisa Wilson-Foley for Congress), First General Counsel’s Report (Feb. 5, 2013); FEC Matter Under Review 6657 (Akin for Senate), First General Counsel’s Report (Sept. 17, 2013); FEC Matter Under Review 6722 (House Majority PAC), First General Counsel’s Report (Aug. 6, 2013). In each of these matters, the Commission has unanimously voted to dismiss the complaints.

<sup>24</sup> Compl. at 3.

<sup>25</sup> *See, e.g.*, FEC Matter Under Review 5754 (MoveOn.org Voter Fund), Factual and Legal Analysis of Alleged Coordination at 3-4.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

Jeff S. Jordan  
December 19, 2016  
Page 5

future use, they would not have resulted in a coordinated communication, insofar as the duck did not represent a "public communication" under the Act.<sup>28</sup>

### Conclusion

The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act.<sup>29</sup> For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination."<sup>30</sup> Additionally, the Commission has made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are *not* sufficient to find reason to believe that Respondents violated the Act.<sup>31</sup> Here, Complainants rely exclusively on speculation and unwarranted legal conclusions to allege Respondents have violated the Act. Accordingly, we request the Commission find no reason to believe Respondents committed any violation of the Act and dismiss this matter immediately.

We appreciate the Commission's consideration of this response.

Very truly yours,



Marc E. Elias  
Brian G. Svoboda  
Courtney Weisman  
Counsel to Respondents

<sup>28</sup> See 11 C.F.R. §§ 109.21(c)(2), 100.26 (defining "public communication" as a communication made "by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public or any other form of general public political advertising.").

<sup>29</sup> 11 C.F.R. § 109.21(a).

<sup>30</sup> FEC Matter Under Review 5754, *supra* note 31.

<sup>31</sup> FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000).

# Exhibit A





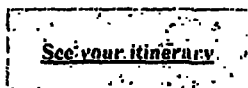
Thanks!

Your reservation is confirmed. No need to call to reconfirm.

Fairfield Inn & Suites Wilkes-Barre Scranton, Wilkes-Barre

Oct 10, 2016 - Oct 11, 2016

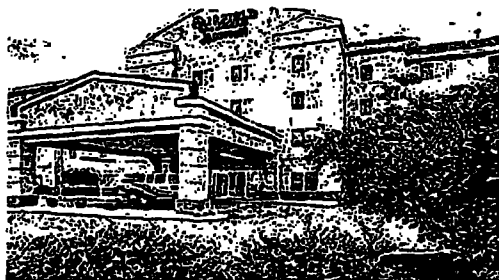
See live updates to your itinerary, anywhere and anytime.



Or get the free app:



#### Hotel overview



Fairfield Inn & Suites Wilkes-Barre Scranton

884 Kidder Street, Wilkes-Barre, PA, 18702 United States of America

[View hotel](#)

[Map and directions](#)

#### Reservation dates

Oct 10, 2016 - Oct 11, 2016

#### Itinerary #

7216566802395

#### Check-in and Check-out

3:00PM

noon

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**Room**

**Guests**

Reserved for Aaron Minter

1 adult

**Room**

Suite, 1 King Bed

**Included amenities**

Continental Breakfast, Free High-Speed Internet

**Room requests**

1 king bed

Non-smoking room

---

**Price summary**

**Expedia**

**Price breakdown**

Room price: \$154.29

1 night: \$139.00

Taxes & fees : \$15.29

402 points

for this trip

**Total \$154.29**

Collected by Expedia

Unless specified otherwise, rates are quoted in US dollars.

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**Additional hotel fees**

The below fees and deposits only apply if they are not included in your selected room rate.

The price shown above DOES NOT include any applicable hotel service fees, charges for optional incidentals (such as minibar snacks or telephone calls), or regulatory surcharges. The hotel will assess these fees, charges, and surcharges upon check-out.

---

**Rules and restrictions**

**Cancellations and changes**

We understand that sometimes plans fall through. We do not charge a cancel or change fee. When the hotel charges such fees in accordance with its own policies, the cost will be passed on to you. Fairfield Inn & Suites Wilkes-Barre Scranton charges the

The room type and rate selected are non-refundable. Should you change or cancel this reservation for any reason, your payment will not be refunded.

No refunds will be issued for late check-in or early check-out.

Stay extensions require a new reservation.

#### **Pricing and Payment**

##### **Hotel fees**

The price above DOES NOT include any applicable hotel service fees, charges for optional incidentals (such as minibar snacks or telephone calls), or regulatory surcharges. The hotel will assess these fees, charges, and surcharges upon check-out.

##### **Pricing**

Your credit card is charged the total cost at time of purchase. Prices and room availability are not guaranteed until full payment is received.

Some hotels request that we wait to submit guest names until 7 days prior to check in. In such a case, your hotel room is reserved, but your name is not yet on file with the hotel.

##### **Guest Charges and Room Capacity**

Base rate is for 1 guest.

Total maximum number of guests per room/unit is 4.

Maximum number of adults per room/unit is 4.

Maximum number of children per room/unit is 3.

Maximum number of infants per room/unit is 3.

This property considers guests aged 17 and under, at time of travel, to be children.

Availability of accommodation in the same property for extra guests is not guaranteed.

---

#### **More help**

##### **About the Hotel**

For special requests or questions about the property, please call the hotel directly at  
Tel: 1 (570) 208-4455, Fax: 1 (570) 208-4488

##### **About your Reservation**

Visit our [Customer Support](#) page.

Call us at 1-877-261-3523.

For faster service, mention itinerary #7216566802395

Mobilize, Inc., NA

A Member of Democracy Partners  
350 W. Hubbard St., Ste. 200  
Chicago, IL 60654  
Attn. Linda Saucedo

# Invoice

Date	Invoice #
9/2/2016	283

<b>Bill To</b>
Democratic National Committee Attn. Chief Operating Officer 430 S. Capitol Street, SE Washington, DC 20003

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
	General Election Consulting Contract - August 2016 Management - \$14,000/month Immigration Consultant - \$8,000/month Rapid Response Consultants 3 @ \$5,000/month/consultant Kelly Benjamin @ \$500 (8/31 Sarasota Event)	37,500.00	37,500.00
	Reimbursements for Month Breakdown: (see attached) Room Rental: Home Plate Diner - Des Moines, IA (8/27/16) Shipping: Fed Ex shipments of Signs (8/29/16) Duck Materials: Pay Pal - Duck Costume (1 of 3) (8/17/16) Harris Costumes - Duck Costume (2 of 3) (8/19/16) Twin Cities Magic & Costume (3 of 3) (8.19/16) AnyPromo - Rubber Ducks (8/26/16) M&I Recording - DJ Quacker Duck Song (8/31/16) Printing: Boruck Printing & Silkscreening - Printing of Signs in Seattle, WA (8/30/16) Travel: Southwest Airlines (8/16/16) Delta Airlines (8/18/16) Delta Baggage Fee for Duck Costume (8/18/16) Uber (8/18/16) Uber (8/18/16) American Airlines (8/19/16)  Services for Month Breakdown: Trump Events (see Page 2)	3,838.95	3,838.95
Please remit by wire. Confidential instructions attached.		<b>Total</b>	

Mobilize, Inc., NA

A Member of Democracy Partners  
350 W. Hubbard St., Ste. 200  
Chicago, IL 60654  
Attn. Linda Saucedo

# Invoice

Date	Invoice #
9/2/2016	283

<b>Bill To</b>
Democratic National Committee Attn. Chief Operating Officer 430 S. Capitol Street, SE Washington, DC 20003

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
	Bracketing activities for Following Trump Events: Date -Type of Event - City, State  8/2/16 -Town Hall/Presser -Ashburn, VA 8/2/16 - Pressers -Phoenix & Tuscon, AZ 8/3/16 - Presser/Rally - Jacksonville, FL 8/3/16 -Event - Portland, ME 8/4/16 -Presser/Protest/Town Hall - Portland, ME 8/4/16 -Presser/Town Hall -Raleigh, NC 8/4/16 - Presser/Rally - Norfolk, VA 8/5/16 - Presser/Protest - Greenbay, WI 8/5/16 -Press Call/Presser/Protest - Des Moines, IA 8/6/16 - Fundraiser - Nantucket, MA 8/6/16 - Fundraiser - Oyster Harbors, MA 8/6/16 -Rally - Windham, NH 8/7/16 -Presser -Detroit, MI 8/8/16 -Presser/Speech -Detroit, MI 8/8/16 -Presser/Fundraiser -Canton, OH 8/8/16 - Presser - Omaha, NE 8/8/16 - Event -Council Bluffs, IA . 8/9/16 - Presser -East Lancaster, PA 8/9/16 - Presser - Pittsburgh, PA 8/9/16 - Presser - Wilmington, NC 8/9/16 - Presser - Fayetteville, NC 8/10/16 - Presser - Dayton, OH 8/10/16 -Presser - Columbus, OH 8/10/16 - Presser -Abington, VA 8/10/16 - Presser/Protest -Ft. Lauderdale, FL 8/11/16 - Press Call/Presser -La Crosse, WI 8/11/16 -Presser/Protest -Milwaukee, WI 8/11/16 -Rally -Orlando, FL 8/12/16 -Presser/Press Call -Erie, PA 8/12/16 -Presser -Altoona, PA 8/12/16 -Presser -Hartford, CT		

Please remit by wire. Confidential instructions attached.

**Total**

Mobilize, Inc., NA

A Member of Democracy Partners  
350 W. Hubbard St., Ste. 200  
Chicago, IL 60654  
Attn. Linda Saucedo

# Invoice

Date	Invoice #
9/2/2016	283

<b>Bill To</b>
Democratic National Committee Attn. Chief Operating Officer 430 S. Capitol Street, SE Washington, DC 20003

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
	8/13/16 -Rally -Fairfield, CT 8/15/16 - Presser - Youngstown, OH 8/16/16 - Presser/Town Hall - Milwaukee, WI 8/16/16 - Presser/Rally -Milwaukee, WI 8/16/16 - Presser -La Crosse, WI 8/17/16 - Presser/Protest -Henderson, NV 8/18/16 - "Donald Ducks" -New York, NY 8/18/16 - Presser/Fundraiser/Rally -Charlotte, NC 8/18/16 - Visibility -Manchester, NH 8/19/16 -Presser/Rally -Lansing, MI 8/19/16 -Presser/Fundraiser -Minneapolis, MN 8/20/16 - Presser/Rally -Fredericksburg, VA 8/20/16 - Presser/Canvass - Des Moines, IA 8/22/16 - Press Call -Cedar Rapids, IA 8/22/16 -Presser -Akron, OH 8/23/16 -Presser/Visibility -Fort Worth, TX 8/23/16 - Presser/Visibility -Austin, TX 8/23/16 - Presser -Chicago, IL 8/24/16 -Presser - Jackson, MS 8/24/16 -Presser -Tampa, FL 8/24/16 -Presser -Charlotte, NC 8/24/16 -Presser -Wilmington, NC 8/25/16 -Presser -New York, NY 8/25/16 -Press Call/Visibility -Manchester, NH 8/25/16 -Presser/Visibility -Aspen, CO 8/25/16 -Presser -Phoenix, AZ 8/26/16 -Protest/Fundraiser -Lake Tahoe, NV 8/26/16 -Protest -Las Vegas, NV 8/27/16 -Presser/Protest -Purcellville, VA 8/27/16 -Presser/Protest -Des Moines, IA 8/28/16 -Presser -San Francisco, CA 8/29/16 -Presser -Atlanta, GA 8/29/16 -Presser -Seattle, WA 8/30/16 - Story Placed (AJC) -Dalton, GA		
Please remit by wire. Confidential instructions attached.		<b>Total</b>	

Mobilize, Inc., NA

A Member of Democracy Partners  
350 W. Hubbard St., Ste. 200  
Chicago, IL 60654  
Attn. Linda Saucedo

# Invoice

Date	Invoice #
9/2/2016	283

<b>Bill To</b>
Democratic National Committee Attn. Chief Operating Officer 430 S. Capitol Street, SE Washington, DC 20003

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
	8/30/16 -Presser -Winston-Salem, NC 8/30/16 -Protest/Rally -Everett, WA 8/31/16 -Presser -Phoenix, AZ 8/31/16 -Visibility -Sarasota, FL		

Please remit by wire. Confidential instructions attached.

**Total**

\$41,338.95

Mobilize, Inc., NA

A Member of Democracy Partners  
350 W. Hubbard St., Ste. 200  
Chicago, IL 60654  
Attn. Linda Saucedo

# Invoice

Date	Invoice #
12/8/2016	305

<b>Bill To</b>
Democratic National Committee Attn. Chief Operating Officer 430 S. Capitol Street, SE Washington, DC 20003

P.O. No.	Terms	Project
	Due on receipt	

Quantity	Description	Rate	Amount
	Shipping of Bracketing Materials (See UPS Store Receipt)	336.52	336.52
	Equipment for Trump Hotel Protest (See Mens Warehouse Receipts)	353.15	353.15
	Round Trip Mileage from Washington, DC to Charlotte, NC (806 miles @ \$0.54 per mile) - Overnight drive to help launch "Trump Ducks" debut in Charlotte	435.24	435.24
	Round Trip Mileage from Washington, DC to Fredericksburg, VA (112 miles @ \$0.54 per mile) - "Trump Ducks" Protest in Fredericksburg	60.48	60.48
	Round Trip Mileage from Washington, DC to Philadelphia, PA (274 miles @ \$0.54 per mile) - Meeting in Philadelphia to discuss labor and grassroots outreach	147.96	147.96
Please remit to above address.		<b>Total</b>	<b>\$1,333.35</b>



December 8th 2016

Mobilize DemocracyPartners  
350 W. Hubbard Street, Ste. 200  
Chicago, IL 60654

Linda Saucedo.  
emailed to: [lindasaucedo@democracypartners.com](mailto:lindasaucedo@democracypartners.com).

Make payment to:

James Salt

Washington DC 20011

North Carolina trip involved driving overnight to help launch 'Trump Ducks' debut in Charlotte.

Fredericksburg trip involved 'Trump Ducks' protest

Philadelphia trip involved meeting with HFA staff to discuss labor and grassroots outreach

Round Trip Mileage Washington DC to Charlotte NC 806 miles at \$0.54 per mile.		435.24
Round Trip Mileage Washington DC to Fredericksburg 112 miles at \$0.54 per mile.		60.48
Round Trip Mileage Washington DC to Philadelphia PA 274 miles at \$0.54 per mile.		147.96
Shipping Costs for Trump Ducks costume to Scot Floval		336.52
Tuxedo Costs for Trump Hotel Protestat		353.15
	Total	1333.35

govt. officials, re comm. figs:



THE MENS WEARHOUSE, INC.  
529 14TH STREET NW  
WASHINGTON, DC 20045  
202-783-0128

Consultant: AARON METHENY (AMM152)  
Date: 09/12/2016

Sold To:

Mdse Code	Description	Qty	Price
408A30410	G.K. BRODIE LA	1	99.99
	Price Markdown		-50.00

Total Purchase 49.99

Tax 2.87

Total Sales Amount \$52.86

-- You Saved: \$50.00 --

Grand Total \$52.86

Payments:

Debit Card XXXXXXXXXXXX 52.86  
Date: 09.12.2016 Time: 01:25:37PM  
Auth#: 631536

In store credit only after 90 days

See Return/Exchange Policy at:  
[www.menswearhouse.com/returns](http://www.menswearhouse.com/returns)

Tran No: 3506\*2\*8736 Store No: 3506  
Transaction: SALE Phone: 202-783-0128



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WE INVITE YOU TO VISIT OUR WEBSITE AT:  
[www.menswearhouse.com](http://www.menswearhouse.com)

Thank You



THE MENS WEARHOUSE, INC.  
529 14TH STREET NW  
WASHINGTON, DC 20045  
202-783-0128

Consultant: AARON METHENY (AMM152)  
Date: 09/12/2016

Sold To:

Mdse Code	Description	Qty	Price
360M42310	PUEY TUX SV FF	1	229.99
502T65510	J&F WING TUX	1	49.99
	Price Markdown		-20.00
811480002	PR COAT PRE BOW	1	19.99
	Damage Markdown		-8.00
002680000	PANT PLAIN BOTTOM	1	12.00

Total Purchase 283.97

Tax 16.32

Total Sales Amount \$300.29

-- You Saved: \$28.00 --

Sales Amount Grand Total \$300.29

Payments:

Debit Card XXXXXXXXXXXX 300.29  
Date: 09.12.2016 Time: 01:22:22PM  
Auth#: 870149

In store credit only after 90 days

See Return/Exchange Policy at:  
[www.menswearhouse.com/returns](http://www.menswearhouse.com/returns)

Tran No: 3506\*3\*7083 Store No: 3506  
Transaction: SALE Phone: 202-783-0128



3 5 0 6 \* 3 \* 7 0 8 3

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[www.menswearhouse.com](http://www.menswearhouse.com)

Thank You